

Hearing Date and Time: December 1, 2016 at 10:30 a.m. (Eastern Time)
Response Deadline: November 28, 2016 at 4:00 p.m. (Eastern Time)

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK**

In re:)	Case No. 16-11700
)	
GAWKER MEDIA LLC, <i>et al.</i> , ¹)	Chapter 11
)	
Debtors.)	(Jointly Administered)
)	

**NOTICE OF INTENTION TO WITHDRAW PUBLICIS MEDIA AGENCIES'
OBJECTION TO DEBTORS' MOTION PURSUANT TO BANKRUPTCY CODE
SECTIONS 105, 502(C) AND 1129 AND BANKRUPTCY RULES 3018 AND 3021 FOR
APPROVAL OF CLAIMS ESTIMATION AND PLAN RESERVATION PROCEDURES**

PLEASE TAKE NOTICE that Starcom Worldwide, Inc. and its affiliated agencies in the media advertising and related business (collectively, the “Publicis Media Agencies,” or “Publicis”) hereby submit without prejudice this *Notice of Intention to Withdraw* (the “Notice of Intent”) Publicis’s *Objection to Debtors’ Motion Pursuant to Bankruptcy Code Sections 105, 502(c) and 1129 and Bankruptcy Rules 3018 and 3021 for Approval of Claims Estimation and Plan Reservation Procedures* (the “Objection”) [Dkt. No. 489]. Publicis has reached a resolution of its Objection with the Debtors in principle, and intends to withdraw its Objection upon the Court’s determination to enter an order containing the mutually acceptable language previously circulated to the parties. Publicis will separately file a notice withdrawing its Objection at such time as the form of the proposed order has been finalized.

¹ The last four digits of the taxpayer identification number of the Debtors are: Gawker Media LLC (0492); Gawker Media Group, Inc. (3231); and Gawker Hungary Kft. (f/k/a Kinja Kft.) (5056). Gawker Media LLC and Gawker Media Group, Inc.’s mailing addresses are c/o Opportune LLP, Attn: William D. Holden, Chief Restructuring Officer, 10 East 53rd Street, 33rd Floor, New York, NY 10020. Gawker Hungary Kft.’s mailing address is c/o Opportune LLP, Attn: William D. Holden, 10 East 53rd Street, 33rd Floor, New York, NY 10020.

DATED November 30, 2016.

Respectfully submitted,

/s/ Casey B. Howard

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*Counsel to Starcom Worldwide, Inc. and
its affiliated media agencies*

CERTIFICATE OF SERVICE

I, Casey B. Howard, an attorney, certify that on November 30, 2016, I caused the foregoing to be served by electronic notice through the CM/ECF system of the United States Bankruptcy Court for the Southern District of New York on those parties entitled to electronic service, and by electronic mail to the parties identified below:

Gawker Media LLC
c/o Opportune LLP
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Susan Arbeit
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New York, NY 10014
U.S. Trustee's Office

Internal Revenue Service
Attn: Centralized Insolvency Operation
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Philadelphia, PA 19104
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/s/ Casey B. Howard
Casey B. Howard